

AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means

☐ OriginalCERTIFIED TRUE COPY  
ATTEST: WILLIAM M. MCCOOL  
Clerk, U.S. District Court  
Western District of WashingtonBy [Signature]  
Deputy Clerk

## UNITED STATES DISTRICT COURT

for the  
Western District of WashingtonIn the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)Residence Located at  
2000 Northeast 16th Street, Renton, Washington  
More Fully Described in Attachment A)  
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Case No. MJ21-309

## WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Western District of Washington  
(identify the person or describe the property to be searched and give its location):

A Residence, more fully described in Attachment A, incorporated herein by reference.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B, attached hereto and incorporated herein by reference.

**YOU ARE COMMANDED** to execute this warrant on or before June 9, 2021 (not to exceed 14 days)  
☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to any U.S. Magistrate Judge in this District  
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)☐ for \_\_\_\_\_ days (not to exceed 30) ☐ until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: 05/26/2021 11:00 am

[Signature]

Judge's signature

City and state: Seattle Washington

BRIAN A. TSUCHIDA, United States Magistrate Judge

Printed name and title

**ATTACHMENT A****Place to Be Searched (SUBJECT PREMISES)**

The place to be searched is 2000 Northeast 16<sup>th</sup> Street, Renton, Washington 98056, a two-story structure located on the north side of Northeast 16<sup>th</sup> Street and is a corner house. The exterior is a mix of light green/tan siding and rock, with tan trim. The entry door is located to the left of the garage. The numbers "2000" are located to the right side of the garage door.

The search is to include all storage areas associated within the premises, such as on-site storage lockers, detached storage sheds, and parking stalls, or safes; and any digital device(s) or other electronic storage media.





**ATTACHMENT B**

**List of Items to Be Seized**

Evidence, fruits, and instrumentalities of violations of 21 U.S.C. § 841(a)(1) (Distribution of and Possession with Intent to Distribute Controlled Substances), involving TRI DUONG, as follows:

1. **Controlled Substances:** Including but not limited to methamphetamine, fentanyl, cocaine, crack cocaine, heroin, hashish, marijuana, MDMA, methadone, oxycodone, Oxycontin, Suboxone, Clonazepam, Alprazolam, Xanax, and Adderall;

2. **Drug Paraphernalia:** Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, DVD cases, cutting agents, scales, measuring equipment, vials, pill presses, Mylar bags, heat/vacuum sealers, tape, duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items;

3. **Drug Transaction Records:** Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances;

4. **Customer and Supplier Information:** Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, "pay/owe" sheets with drug amounts and prices, maps or directions, and similar items;

5. **Cash and Financial Records:** Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashier's checks, and similar items, and money counters;

6. **Photographs/Surveillance:** Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances;

7. **Weapons:** Including but not limited to firearms, magazines, ammunition, and body armor;

1 8. Codes: Evidence of codes used in the distribution of controlled substances,  
2 including passwords, code books, cypher or decryption keys, usernames and/or  
3 credentials for dark web marketplaces, and similar information;

4 9. Property Records: Deeds, contracts, escrow documents, mortgage  
5 documents, rental documents, and other evidence relating to the purchase, ownership,  
6 rental, income, expenses, or control of the premises, and similar records of other property  
owned or rented;

7 10. Indicia of occupancy, residency, and/or ownership of assets including,  
8 utility and telephone bills, canceled envelopes, rental records or payment receipts, leases,  
9 mortgage statements, and other documents;

10 11. Evidence of Storage Unit Rental or Access: Rental and payment records,  
11 keys and codes, pamphlets, contracts, contact information, directions, passwords or other  
documents relating to storage units;

12 12. Evidence of Personal Property Ownership: Registration information,  
13 ownership documents, or other evidence of ownership of property including, but not  
14 limited to vehicles, vessels, boats, airplanes, jet skis, all-terrain vehicles, RVs, and  
15 personal property; evidence of international or domestic travel, hotel/motel stays, and any  
other evidence of unexplained wealth;

16 13. Individual and business financial books, records, receipts, notes, ledgers,  
17 diaries, journals, and all records relating to income, profit, expenditures, or losses, such  
18 as:

19 a. Employment records: paychecks or stubs, lists and accounts of  
20 employee payrolls, records of employment tax withholdings and contributions, dividends,  
stock certificates, and compensation to officers.

21 b. Savings accounts: statements, ledger cards, deposit tickets, register  
22 records, wire transfer records, correspondence, and withdrawal slips.

23 c. Checking accounts: statements, canceled checks, deposit tickets,  
24 credit/debit documents, wire transfer documents, correspondence, and register records.

25 d. Loan Accounts: financial statements and loan applications for all  
26 loans applied for, notes, loan repayment records, and mortgage loan records.

27 c. Collection accounts: statements and other records.  
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1 f. Certificates of deposit: applications, purchase documents, and  
2 statements of accounts.

3 g. Credit card accounts: credit cards, monthly statements, and receipts  
4 of use.

5 h. Receipts and records related to gambling wins and losses, or any  
6 other contest winnings.

7 i. Insurance: policies, statements, bills, and claim-related documents.

8 j. Financial records: profit and loss statements, financial statements,  
9 receipts, balance sheets, accounting work papers, any receipts showing purchases made,  
10 both business and personal, receipts showing charitable contributions, and income and  
expense ledgers.

11 14. All bearer bonds, letters of credit, money drafts, money orders, cashier's  
12 checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money  
13 wrappers, stored value cards, and other forms of financial remuneration evidencing the  
obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money;

14 15. All Western Union and/or Money Gram documents and other documents  
15 evidencing domestic or international wire transfers, money orders, official checks,  
16 cashier's checks, or other negotiable interests that can be purchased with cash, to include  
17 applications, payment records, money orders, frequent customer cards, etc;

18 16. Negotiable instruments, jewelry, precious metals, financial instruments, and  
19 other negotiable instruments;

20 17. Documents reflecting the source, receipt, transfer, control, ownership, and  
21 disposition of United States and/or foreign currency;

22 18. Correspondence, papers, records, and any other items showing employment  
23 or lack of employment;

24 19. Telephone books, and/or address books, facsimile machines, any papers  
25 reflecting names, addresses, telephone numbers, pager numbers, cellular telephone  
26 numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-  
27 conspirators, sources of supply, customers, financial institutions, and other individuals or  
28 businesses with whom a financial relationship exists. Also, telephone answering devices  
that record telephone conversations and the tapes therein for messages left for or by co-

1 conspirators for the delivery or purchase of controlled substances or laundering of drug  
2 proceeds;

3 20. Safes and locked storage containers, and the contents thereof which are  
4 otherwise described in this document;

5 21. Tools: Tools that may be used to open hidden compartments in vehicles,  
6 paint, bonding agents, magnets, or other items that may be used to open/close said  
7 compartments;

8 22. Any and all mailing documents and packaging materials related to U.S.  
9 Postal Service, UPS, and FedEx, including but not limited to USPS Express Mail labels,  
10 express mail and priority envelopes, first class mailings, receipts for USPS packages, and  
11 tracking information;

12 23. Any records or information pertaining to the dark web and dark web  
13 marketplaces, including the Empire Market, Deep Sea Market, and White House Market;

14 24. Any records or information pertaining to darknet monikers;

15 25. Cryptocurrency applications and wallets, including information regarding  
16 current account balance and transaction history, i.e., date, time, amount, an address of the  
17 sender/recipient of a cryptocurrency transaction maintained in such wallets;

18 26. Any records or information reflecting cryptocurrencies, including web  
19 history, and documents showing the location, source, and timing of acquisition of any  
20 cryptocurrencies, including wallets, wallet addresses, and seed phrases;

21 27. Any and all cryptocurrency, to include the following: (a) any and all  
22 representations of cryptocurrency public keys or addresses, whether in electronic or  
23 physical format; (b) any and all representations of cryptocurrency private keys, whether  
24 in electronic or physical format; and (c) any and all representations of cryptocurrency  
25 wallets or their constitutive parts, whether in electronic or physical format, to include  
26 "recovery seeds" and "root keys" which may be used to regenerate a wallet.

27 a. The United States is authorized to seize any and all cryptocurrency  
28 by transferring the full account balance in each wallet to a public cryptocurrency address  
controlled by the United States.

1           b. The United States is also authorized to use the above-described  
2 recovery seeds and root keys to reconstitute and/or regenerate any associated  
3 cryptocurrency wallet and to seize any and all cryptocurrency stored in, or accessible via,  
4 such wallet by transferring the full account balance to a public cryptocurrency address  
controlled by the United States.

5           28. Cell Phones: Cellular telephones and other communications devices may be  
6 seized, and searched for the following items:

7           a. Assigned number and identifying telephone serial number (ESN,  
8 MIN, IMSI, or IMEI);

9           b. Stored list of recent received, sent, and missed calls;

10          c. Stored contact information;

11          d. Stored photographs of narcotics, currency, firearms or other  
12 weapons, evidence of suspected criminal activity, and/or the user of the phone and/or co-  
13 conspirators, including any embedded GPS data associated with these photographs;

14          e. Stored text messages, as well as any messages in any internet  
15 messaging apps, including but not limited to Facebook Messenger, iMessage, Wickr,  
16 Telegram, Signal, WhatsApp, Kik, and similar messaging applications, related to the  
17 aforementioned crimes of investigation or that may show the user of the phone and/or  
co-conspirators, including Apple iMessages, Blackberry Messenger messages or other  
similar messaging services where the data is stored on the telephone;

18          f. Any Tor applications and records for Tor activity, including browser  
19 history and "bookmarked" or "favorite" web pages;

20          g. Digital currency applications and wallets, to include information  
21 regarding current account balance and transaction history, i.e., date, time, amount, an  
22 address of the sender/recipient of a digital currency transaction maintained in such  
23 wallets;

24          h. Stored documents, notes, and files that contain passwords/or  
25 encryption keys;

26          i. PGP applications, to include stored private and/or public keys;

27          j. Any records or information related to darknet monikers; and  
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1        29. Digital devices, such as computers, and other electronic storage media,  
2 such as USBs and Trezor devices, may be seized, and searched for the following items:

3            a. Evidence of who used, owned, or controlled the digital device or  
4 other electronic storage media at the time the things described in this warrant were  
5 created, edited, deleted, such as logs, registry entries, configuration files, saved  
6 usernames and passwords, documents, browsing history, user profiles, email, email  
7 contacts, "chats," instant messaging logs, photographs, and correspondence;

8            b. Evidence of software that would allow others to control the digital  
9 device or other electronic storage media, such as viruses, Trojan horses, and other forms  
10 of malicious software, as well as evidence of the presence or absence of security software  
11 designed to detect malicious software;

12            c. Evidence of the lack of such malicious software;

13            d. Evidence of the attachment to the digital device of other storage  
14 devices or similar containers for electronic evidence;

15            e. Evidence of counter-forensic programs (and associated data) that are  
16 designed to eliminate data from the digital device or other electronic storage media;

17            f. Evidence of the times the digital device or other electronic storage  
18 media was used;

19            g. Passwords, encryption keys, and other access devices that may be  
20 necessary to access the digital device or other electronic storage media;

21            h. Contextual information necessary to understand the evidence  
22 described in this attachment;

23            i. Records or information pertaining to the dark web and dark web  
24 marketplaces, including the Empire Market;

25            j. Any records or information pertaining to darknet monikers;

26            k. Any records or information pertaining to Tor;

27            l. Any records or information pertaining to mnemonic phrases;  
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1           m. Any records or information reflecting cryptocurrencies, including  
2 web history, and documents showing the location, source, and timing of acquisition of  
3 any cryptocurrencies, to include wallets, wallet addresses, and seed phrases; and

4           n. Any records or information pertaining to PGP applications, to  
5 include private and/or public keys.

6 THE SEIZURE OF DIGITAL DEVICES IS AUTHORIZED FOR THE PURPOSE OF  
7 CONDUCTING OFF-SITE EXAMINATION OF THEIR CONTENTS FOR  
8 EVIDENCE, INSTRUMENTALITIES, OR FRUITS OF THE AFOREMENTIONED  
9 CRIMES.  
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Name of Person

Case Number	
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- ☐ Received From  
☐ Returned To  
☐ Released To  
☐ Seized From

Address (No., st., ste./apt. no., city, state, ZIP + 4)

2000 NE 16th, Renton, WA 98056

21INV00761

Date and Time

05 / 27 / 2021

☐ AM  
☐ PM[illegible]

Received by *(Printed name and signature)*

Received from (Printed name and signature)



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## Return

Case No.: <b>MJ21-309</b>	Date and time warrant executed: <b>5/27/21 1105 AM</b>	Copy of warrant and inventory left with: <b>Residence</b>
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Inventory made in the presence of:

**SA CHARLES NALLEY**

Inventory of the property taken and name(s) of any person(s) seized:

**- SEE ATTACHED INVENTORY**

\* Item #9, "Bulk Cash," consisted of \$140,390.00 in U.S. currency, found in a shoe box.

\* Item #11, "Bulk Cash," consisted of \$4,459.00 in U.S. currency.

\* Item #12, "Bulk Cash in 5 gallon water jug," contained \$62,112.75 in U.S. currency.

\* Item #15, "purse with bulk cash," contained \$5,650.00 in U.S. currency.

\* Item #20, "misc. narcotics," consisted of:

- 15 pink pills marked "supreme" and "C/P."
- 15 green pills with Yoda emblem and 2 plugs.
- 11 blue pills with IRON MAN emblem and "300 | GG."
- 1 partial pink pill.
- 10 vials marked as 10ml of Ketamine.
- 9.3g of brown rock substance.

## Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: **6/4/21****Stacy Vaughan****Casey J. Snyder**

Executing officer's signature

**Casey J. Snyder, Special Agent**

Printed name and title